

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America  
v.  
Donald Wilson

Case: 2:19-mj-30413  
Assigned To : Unassigned  
Assign. Date : 8/5/2019  
Description: RE: SEALED MATTER  
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 14, 2019 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 922(g)(1)	Felon in possession of a firearm

This criminal complaint is based on these facts:  
See attached AFFIDAVIT.

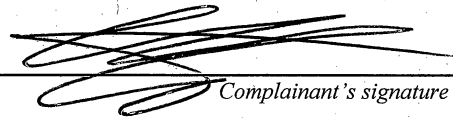
☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

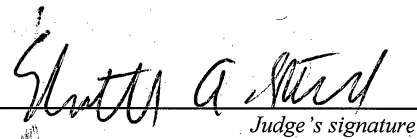
Date:

8-5-19

City and state: Detroit, Michigan

  
Complainant's signature

Christopher Loperfido, Special Agent (ATF)  
Printed name and title

  
Judge's signature

Hon. Elizabeth A. Stafford, U.S. Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Christopher Loperfido, being duly sworn, do hereby state the following:

**I. INTRODUCTION**

1. I am a Special Agent, with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) United States Department of Justice, and have been so employed since December of 2018. Prior to becoming a Special Agent with the ATF, I was a United States Border Patrol Agent for nine years in Texas and Washington State. I am currently assigned to the ATF Detroit Field Division. I completed twenty-six weeks of training, which was comprised of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving firearms and narcotics trafficking, and identification and effects of controlled substances. Additionally, I received training on undercover investigations related to firearms and narcotics trafficking, which included investigative techniques and common subject behavior.

2. During the course of my employment with ATF, I have assisted with investigating criminal violations relating to firearms, violent crime, and narcotics. I have participated in aspects of criminal investigations, including, but not limited to, interviews, physical surveillance, and the execution of search warrants. I am

familiar with, and have participated in investigative methods, including, but not limited to, electronic surveillance, visual surveillance, search warrants, and confidential informants.

3. The statements contained in this affidavit are based on conversations with other law enforcement officers, a review of relevant police reports and my involvement in this investigation. This affidavit also includes information provided to me by and/or through other law enforcement agents, investigators and individuals with knowledge of this matter, my investigation, and the review of documents. This affidavit summarizes such information but does not provide each and every detail I know regarding this investigation; rather it provides information necessary to establish probable cause that Donald WILSON violated Title 18 United States Code, Section 922 (g)(1), felon in possession of a firearm.

## **II. PROBABLE CAUSE**

4. On July 14, 2019, Detroit Police Department Officers were on routine patrol on Cornwall Street approaching Balfour Road in Detroit, Michigan, when the officers observed a black 2014 Chrysler 300, bearing Michigan license plate; DXY-XXXX, driving southbound on Balfour Road at a high speed (70 M.P.H.). Officers initiated a traffic stop on the previously mentioned vehicle due to the vehicle traveling at a high speed.

5. Officers made contact with the driver, identified as Donald WILSON. Officers asked WILSON for a valid driver's license, registration, and insurance. WILSON stated he only had a Michigan identification card and his license was suspended. In addition, Officers asked if WILSON possessed a Concealed Pistol License (CPL), WILSON replied he did not. Officers requested WILSON step out of the vehicle.

6. WILSON then stated he had his firearm underneath the driver's seat. Officers arrested WILSON for Driving with License Suspended (DWLS). Officers then looked underneath the driver's seat and located a black Smith and Wesson, model SW40F, .40 caliber, semi-automatic pistol, serial number: PAL9196. The firearm was loaded with one round of ammunition, and the magazine contained 12 rounds of ammunition.

7. I reviewed WILSON's Computerized Criminal History (CCH), and it revealed the following felony convictions for WILSON:

- a. 1998-Felony- Controlled Substance- Delivery/Manufacture (Cocaine, Heroin, or Another Narcotic) Less Than 50 Grams- Detroit, Michigan;
- b. 2004-Felony- Controlled Substance- Delivery/Manufacture (Cocaine, Heroin, or Another Narcotic) Less Than 50 Grams- Detroit, Michigan;  
and
- c. 2011- Felony- Weapons Felony and Attempt Felony- Controlled

Substance- Delivery/Manufacture (Cocaine, Heroin, or Another  
Narcotic) Less Than 50 Grams- Detroit, Michigan

8. As a result of the above felony convictions, WILSON was incarcerated with the Michigan Department of Corrections from August of 2004 to February of 2007 and December of 2011 to March of 2015.

9. On August 1, 2019, I contacted ATF interstate nexus expert Special Agent Shannon Richardson who reported that the Smith and Wesson, model SW40F, .40 caliber, semi-automatic pistol, serial number: PAL9196 recovered from WILSON was manufactured outside the State of Michigan, and therefore had traveled in and affected interstate commerce.

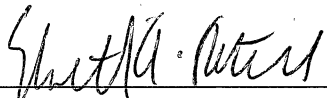
### III. CONCLUSION

10. Based upon the above information, there is probable cause to believe that Donald WILSON, a person who knew he was a convicted felon, did knowingly and intentionally possess a firearm in the City of Detroit in the Eastern District of Michigan, said firearm having travelled in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1), felon in possession of a firearm.



Christopher Loperfido  
Special Agent, ATF

Sworn to and subscribed to me in my presence,  
this 5<sup>th</sup> day of August, 2019



Hon. Elizabeth A. Stafford  
UNITED STATES MAGISTRATE JUDGE